

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

DEFENDANT'S ASSENTED-TO MOTION TO CONTINUE
SENTENCING

Defendant, Wendy Dinkins, respectfully moves this Court to continue her sentencing (currently scheduled for September 9, 2005) for approximately 30 days.

As grounds for this motion, undersigned counsel received, on September 6, 2005, a report from the government containing information which may bear directly on the court's sentencing decision. Undersigned counsel reviewed the report with defendant yesterday, September 8. Undersigned counsel needs additional time to investigate several claims made in the report, and prepare a response where necessary.

The Court may recall that this case involves a request by defendant to sentence her below the applicable guideline range on the basis of her family circumstances. The Court indicated at the last hearing in this matter that it was inclined to grant the parties some latitude with respect to the timing of the final sentencing hearing, in order that the parties might fully address

several issues raised by the Court in response to defendant's sentencing recommendation.

Assistant U.S. Attorney Adam J. Bookbinder assents to this motion.

WENDY DINKINS
By her attorney,

/s/ J. Martin Richey

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